

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

**CONSOLIDATED INDUSTRIES, LLC
d/b/a WEATHER KING PORTABLE
BUILDINGS,**

Plaintiff,

v.

**JESSE A. MAUPIN, BARRY D.
HARRELL, ADRIAN S. HARROD,
LOGAN C. FEAGIN, STEPHANIE L.
GILLESPIE, RYAN E. BROWN,
DANIEL J. HERSHBERGER, BRIAN L.
LASSEN, ALEYNA LASSEN, and
AMERICAN BARN CO., LLC,**

Defendants.

Civil Action No. 1:22-cv-01230-STA-jay

Chief Judge S. Thomas Anderson

**MOTION FOR SUMMARY JUDGMENT AND
MOTION TO DISMISS FOR LACK OF SUBJECT MATTER JURISDICTION**

In accordance with Fed. R. Civ. P. 56, Local Rule 56.1, Fed. R. Civ. P. 12(b)(1), and Local Rule 12.1, Defendants move for an entry of an order as follows:

1. Dismissal of Count I and II of the Complaint for lack of legally-cognizable trade secrets;
2. Dismissal of the remaining Counts of the Complaint for lack of subject matter jurisdiction;
3. Dismissal of the entire case; and
4. Such as other relief as the Court deems just.

The reasons and support for this motion are laid out in the accompanying brief.

Date: June 14, 2023

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LASSEN, and AMERICAN BARN CO., LLC

CERTIFICATE OF SERVICE

I certify that on June 14, 2023 I filed a true and correct copy of the foregoing **MOTION FOR SUMMARY JUDGMENT AND MOTION TO DISMISS FOR LACK OF SUBJECT MATTER JURISDICTION** with the Court using the ECF system, which will provide notice and a copy to counsel of record:

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